
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FIREARM OWNERS AGAINST :	
CRIME, KIM STOLFER, and	
JOSHUA FIRST,	Jury Trial Demanded
Plaintiffs	:
	:
v.	Judge Yvette Kane
	:
CITY OF HARRISBURG,	
MAYOR ERIC PAPENFUSE,	
and POLICE CHIEF THOMAS	Docket No. 1:15-cv-322-YK
CARTER,	
Defendants	:

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
BRIEF IN EXCESS OF WORD AND PAGE LIMITS**

Plaintiffs Firearm Owners Against Crime (hereinafter “FOAC”), Kim Stolfer, and Joshua First [collectively, “Plaintiffs”], by and through their counsel, Joshua Prince, Esq., and Prince Law Offices, P.C., hereby respectfully request this Honorable Court for Leave to file their brief in opposition to Defendants’ Motion to Dismiss, whereby such brief shall not exceed twenty (20) pages or 6,660 words, whichever is greater.

Plaintiff has conferred with counsel for Defendants, who do not oppose the granting of this Motion.

In support their motion, Plaintiffs state:

1. On February 27, 2015, Defendants filed a Motion to Dismiss, for which they filed their Brief in Support on March 6, 2015.
2. Defendants Brief in Support is twenty-two pages with a word count certification that the brief contains 5,000 words, including footnotes, and contains a plethora of arguments requiring response.

3. On March 18, 2015, Plaintiffs filed a Motion to Stay Defendants' Motion to Dismiss, Consolidate Other Pending Motions, and for Enlargement of Time.
4. On March 19, 2015, this Honorable Court denied Plaintiffs' Motion but granted Plaintiffs until March 26, 2015 to submit their brief in opposition to Defendants' Motion to Dismiss.
5. Pursuant to LR 7.8, briefs are limited to 15 pages or 5,000 words, whichever is greater; however, if in excess of 15 pages but within 5000 words, counsel must submit a certification of the word count.
6. Owing to the complexity and numerosity of the issues, Plaintiffs request their brief in opposition to Defendants' Motion to Dismiss be enlarged to 20 pages or 6,660 words, whichever is greater, although counsel always aspires not to fully utilize any page or word limit.
7. As Defendants additionally have the opportunity to submit a reply brief of 15 pages or 5,000 words, for a total of 30 pages or 10,000 words, between their original brief in support and any reply brief, Plaintiffs believe this request is reasonable given the constitutional issues and arguments raised.
8. Defendants have stated that they do not oppose this Motion.

WHEREFORE, Plaintiffs respectfully request that on or before March 26, 2015, they be permitted to file their brief in opposition to Defendants' Motion to Dismiss, not to exceed twenty (20) pages or 6,660 words, whichever is greater.

Respectfully Submitted,



Joshua Prince, Esq.

Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I, Joshua Prince, Esq., hereby certify that on March 23, 2015, I served a true and correct copy of Plaintiffs' *Unopposed Motion for Leave to File Brief in Excess of Word and Page Limits* on the following parties via this Courts electronic filing system:

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Respectfully Submitted,



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